

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
STEWARD HEALTH CARE SYSTEM	§	Case No. 24-90213 (CML)
LLC, <i>et al.</i> ,	§	
	§	(Jointly Administered)
Debtors. ¹	§	
	§	
	§	

**NOTICE OF DESIGNATION OF
HEALTHCARE SYSTEMS OF AMERICA AS DESIGNATED
OPERATOR FOR ST. JOSEPH MEDICAL CENTER, MEDICAL
CENTER OF SOUTHEAST TEXAS, AND SOUTH FLORIDA HOSPITALS**

PLEASE TAKE NOTICE THAT:

1. On May 6, 2024, Steward Health Care System LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (the “**Debtors**”), each commenced with this Court a voluntary case under chapter 11 of title 11 of the United States Code.

2. On September 18, 2024, this Court entered the *Final Order Approving (I) Global Settlement With Medical Properties Trust, Prepetition ABL/FILO Secured Parties, FILO Secured Parties, and Creditors’ Committee, (II) Interim Management Procedures, and (III) Granting Related Relief* (Docket No. 2610) (the “**Global Settlement Order**”) approving a global settlement (the “**Global Settlement**”) with, among others, Medical Properties Trust, Inc. (together with its affiliates, “**MPT**”) that, among other things, approved procedures for designating operators for certain of the Debtors’ hospitals in Ohio, Louisiana, Arizona, Texas, and Florida.²

Designation of Designated Operator

3. Pursuant to the Global Settlement, MPT has designated affiliates of Healthcare Systems of America (“**HSA**”) as the Designated Operator for St. Joseph Medical Center

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/Steward>. The Debtors’ service address for these chapter 11 cases is 1900 N. Pearl Street, Suite 2400, Dallas, Texas 75201.

² Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to such terms in the Global Settlement Order and the Settlement Term Sheet, attached to the Global Settlement Order as Exhibit A.

(“**St. Joseph**”), Medical Center of Southeast Texas (“**Port Arthur**”), and the South Florida Hospitals.³

4. A proposed order (the “**Sale Order**”) approving the conveyance of St. Joseph, Port Arthur, and the South Florida Hospitals to HSA is attached hereto as **Exhibit A**.

5. A copy of that certain *Bill of Sale, Assignment and Assumption Agreement*, by and among HSA St Joseph LLC and certain of the Debtors is attached to the Sale Order as **Exhibit 1** (the “**St. Joseph Bill of Sale**”).

6. A copy of that certain *Bill of Sale, Assignment and Assumption Agreement*, by and among HSA Port Arthur LLC and certain of the Debtors is attached to the Sale Order as **Exhibit 2** (the “**Port Arthur Bill of Sale**”).

7. A copy of that certain *Bill of Sale, Assignment and Assumption Agreement*, by and among Healthcare Systems of America-Florida LLC and certain of the Debtors, in substantially final form, is attached to the Sale Order as **Exhibit 3** (the “**Florida Bill of Sale**”).⁴

Objection Deadline

8. The Objection Deadline with respect to the designation of HSA as the Designated Operator for St. Joseph, Port Arthur, and the South Florida Hospitals is **October 8, 2024 at 11:59 p.m. (Central Time)**.

Hearing

9. In accordance with the Global Settlement Order, if no Objection is filed and served by the Objection Deadline, the Debtors may submit the Sale Order to the Court and the Court may enter such order without a hearing.

10. If an Objection is timely filed and not withdrawn or resolved (an “**Unresolved Objection(s)**”), the Debtors shall file a notice scheduling an emergency hearing for the Court to consider the Unresolved Objection(s), subject to the Court’s schedule.

Additional Information

11. If you have questions concerning the contents of this notice or the designation process, you should contact the representatives of the Debtors with whom you have previously been in contact or counsel to the Debtors, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Ray C. Schrock, Esq. (ray.schrock@weil.com) and Candace M. Arthur, Esq. (candace.arthur@weil.com)), 1395 Brickell Avenue, Suite 1200, Miami, Florida

³ The South Florida Hospitals include: (i) Coral Gables Hospital, (ii) Hialeah Hospital, (iii) North Shore Medical Center, (iv) Florida Medical Center, and (v) Palmetto General Hospital.

⁴ Together with the St. Joseph Bill of Sale and the Port Arthur Bill of Sale, the “**Bills of Sale**.”

33131 (Attn: David J. Cohen, Esq. (davidj.cohen@weil.com)), and 700 Louisiana Street, Suite 3700, Houston, Texas 77002 (Attn: Clifford Carlson, Esq. (clifford.carlson@weil.com) and Stephanie N. Morrison, Esq. (stephanie.morrison@weil.com)).

12. Copies of the Global Settlement Order, the Interim Management Procedures, and the Bills of Sale may be obtained free of charge at the website dedicated to the Debtors' chapter 11 cases maintained by their claims and noticing agent and administrative advisor, Kroll Restructuring Administration LLC, located at <https://restructuring.ra.kroll.com/Steward>.

Dated: October 3, 2024
Houston, Texas

/s/ Clifford W. Carlson

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*Attorneys for Debtors and Debtors in
Possession*

Certificate of Service

I hereby certify that on October 3, 2024, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Clifford W. Carlson

Clifford W. Carlson